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APPLE INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

APPLE INC.,  
Plaintiff,  
v.  
WI-LAN, INC.,  
Defendant.

AND RELATED  
COUNTERCLAIMS

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CASE NO. 3:14-cv-02235-DMS-BLM  
(lead case);  
CASE NO. 3:14-cv-1507-DMS-BLM  
(consolidated)

**DECLARATION OF JACOB  
ANDERSON IN SUPPORT OF  
PLAINTIFF APPLE INC.'S  
OPPOSITION TO DEFENDANT  
WI-LAN, INC.'S MOTION TO  
COMPEL AND MOTION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL**

Dept: 13A  
Judge: Hon. Dana M. Sabraw  
Magistrate Judge: Hon. Barbara L. Major

1 I, Jacob Anderson, declare:

2 1. I am an associate with the law firm of DLA Piper LLP (US), counsel  
3 of record for Plaintiff Apple Inc. (“Apple”) in this case. I have personal knowledge  
4 of the facts set forth in this declaration and, if called as a witness, could and would  
5 testify competently to these facts under oath.

6 2. Attached hereto as Exhibit A is a true and correct copy of an excerpt of  
7 a printout of <https://mobilecommunicationsportal.intel.com>, last accessed October  
8 24, 2017.

9 3. Attached hereto as Exhibit B is a true and correct copy of an excerpt of  
10 a printout of  
11 [https://createpoint.qti.qualcomm.com/dashboard/public/productkit#public/product-](https://createpoint.qti.qualcomm.com/dashboard/public/productkit#public/product-kit/search)  
12 [kit/search](https://createpoint.qti.qualcomm.com/dashboard/public/productkit#public/product-kit/search), last accessed October 24, 2017.

13 4. Attached hereto as Exhibit C is a true and correct copy of excerpts  
14 from the Rough Deposition Transcript of Sree Ram Kodali, dated September 21,  
15 2017. The deposition transcript was designated by Apple as “HIGHLY  
16 CONFIDENTIAL—ATTORNEYS’ EYES ONLY.”

17 5. Attached hereto as Exhibit D is a true and correct copy of a printout  
18 from <https://www-ssl.intel.com/content/www/us/en/legal/terms-of-use.html>, last  
19 accessed October 24, 2017.

20 6. Attached hereto as Exhibit E is a true and correct copy of a printout  
21 from <https://www.qualcomm.com/site/terms-of-use>, last accessed October 25,  
22 2017.

23 7. Attached hereto as Exhibit F is a true and correct copy of a Subpoena  
24 to Qualcomm Inc. to Produce Documents, Information, or Objects or to Permit  
25 Inspection of Premises in a Civil Action and Subpoena to Testify at a Deposition in  
26 a Civil Action, dated May 25, 2017.

27 8. Attached hereto as Exhibit G is a true and correct copy of a Subpoena  
28 to Intel Corporation to Produce Documents, Information, or Objects or to Permit

-1-

1 Inspection of Premises in a Civil Action and Subpoena to Testify at a Deposition in  
2 a Civil Action, dated October 16, 2017.

3 9. Attached hereto as Exhibit H is a true and correct copy of a printout of  
4 <http://www.radio-electronics.com/info/wireless/wimax/ieee-802-16-standards.php>,  
5 last accessed on October 24, 2017.

6 I declare under penalty of perjury under the laws of the State of California  
7 and the United States of America that the foregoing is true and correct.

8 Executed on October 25, 2017 at San Diego, California.

9  
10 /s/ Jacob Anderson

Jacob Anderson  
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**TABLE OF CONTENTS****EXHIBITS**

<b><u>Exhibit</u></b>	<b><u>Description</u></b>	<b><u>Page(s)</u></b>
A	Excerpt of printout of <a href="https://mobilecommunicationsportal.intel.com">https://mobilecommunicationsportal.intel.com</a> , last accessed October 24, 2017	3-6
B	Excerpt of printout of <a href="https://createpoint.qti.qualcomm.com/dashboard/public/productkit#public/product-kit/search">https://createpoint.qti.qualcomm.com/dashboard/public/productkit#public/product-kit/search</a> , last accessed October 24, 2017	7
C	Excerpts from the Rough Deposition Transcript of Sree Ram Kodali, dated September 21, 2017 ( <i>Lodged Conditionally Under Seal – Confidential</i> )	8-15
D	Printout from <a href="https://www-ssl.intel.com/content/www/us/en/legal/terms-of-use.html">https://www-ssl.intel.com/content/www/us/en/legal/terms-of-use.html</a> , last accessed October 24, 2017	16-29
E	Printout from <a href="https://www.qualcomm.com/site/terms-of-use">https://www.qualcomm.com/site/terms-of-use</a> , last accessed October 25, 2017	30-39
F	Subpoena to Qualcomm Inc. to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action and Subpoena to Testify at a Deposition in a Civil Action, dated May 25, 2017	40-117
G	Subpoena to Intel Corporation to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action and Subpoena to Testify at a Deposition in a Civil Action, dated October 16, 2017	118-164
H	Printout of <a href="http://www.radio-electronics.com/info/wireless/wimax/ieee-802-16-standards.php">http://www.radio-electronics.com/info/wireless/wimax/ieee-802-16-standards.php</a> , last accessed on October 24, 2017	165-174